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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of

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Commnet of Arizona, LLC)
Commnet of Delaware, LLC)
Elbert County Wireless, LLC)
Chama Wireless, LLC)
Excomm, LLC)
Commnet PCS, Inc)
MoCelCo, LLC)
Tennessee Cellular Telephone Company)
Commnet Four Corners, LLC)
Commnet of Florida, LLC)
Prairie Wireless, LLC)
)
For Waiver of Deadlines for)
Implementation of Phase II E911)
)
And for Partial Waiver of Section 20.18(d) to)
Demarcate Cost Allocation at the)
Wireless Carrier Mobile Switching Center)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 94-102

To The Commission

REQUEST FOR EXTENSION OF TIME

Commnet of Arizona, LLC ("CAZ"), Commnet of Delaware, LLC ("CDL"), Elbert County Wireless, LLC ("Elbert"), Chama Wireless, LLC ("Chama"), Excomm, LLC ("Excomm"), Commnet PCS, Inc. ("CPI"), MoCelCo, LLC ("MCC"), Tennessee Cellular Telephone Company ("TCTC"), Commnet Four Corners, LLC ("CFC")¹, Prairie Wireless, LLC ("Prairie") and Commnet of Florida, LLC ("Florida") (collectively, the "Petitioner-Small-Carriers"), by their attorneys, hereby request an extension of time of thirty days within which to

¹ Commnet is a wholly-owned subsidiary of Commnet Wireless, LLC, formerly named Commnet Capital, LLC ("Capital"), and has succeeded to the licenses formerly licensed to its 100% parent. Thus, CFC is being substituted for Capital as the party to this proceeding.

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supplement their respective showings in support of their pending E911 waiver requests. In support whereof, the Petitioner-Small Carriers state as follows:

In its *Order to Stay*, FCC 03-241, released October 10, 2003, the Commission temporarily granted the bulk of the request for stay of E911 deadlines sought by the Petitioner-Small Carriers. However, the Commission directed the Petitioner-Small Carriers (and others similarly situated) to provide supplemental factual support for their respective waiver requests within thirty days of the release date of that decision.

Since the release of the *Order to Stay*, the Petitioner-Small Carriers have been in contact with the PSAPs in their service territories and are assessing different possibilities for achieving E911 compliance in the most expeditious manner, and doing so in a way that enables each PSAP to utilize the information. However, in part because of moving developments on the technology front, the Petitioner-Small Carriers are still assessing various implementation alternatives, and are not in a position to authoritatively supplement the record at this time.

Accordingly, the Petitioner-Small Carriers hereby request an additional thirty days, to and including December 9, 2003, within which to supplement their waiver request.

Each of the Petitioner-Small-Carriers is a “Tier III” wireless carrier, as defined in the Commission’s decision in *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, 17 FCC Rcd 14841 (2002) (“*Small Carrier E911 Extension*”). Each serves only rural areas – to the limited extent that any areas within MSAs are served, it is as an “unserved area” licensee. Thus, even these are rural in nature.²

² All facts set forth herein are supported by the Declaration of David Walker, who is E911 Liaison Officer for each of the Petitioner-Small-Carriers, attached hereto as Exhibit B.

Moreover, the Petitioner-Small Carriers are also unique in that they have all adopted a "carriers' carrier" business model. They no longer have any subscribers, and will not have any in the future. Rather, they serve incoming roamers of the various major carriers whose subscribers roam into the remote rural areas served by the Petitioner-Small Carriers. Thus, certain of the E911 implementation deadlines, such as the benchmarks for percentage of E911 capable handsets in the subscriber population, simply have no relevance to the Petitioner-Small Carriers.

Respectfully submitted,

**COMMNET OF ARIZONA, LLC, COMMNET OF DELAWARE, LLC,
ELBERT COUNTY WIRELESS, LLC, CHAMA WIRELESS LLC,
EXCOMM, LLC, COMMNET PCS, INC., MOCELCO, LLC, TENNESSEE
CELLULAR TELEPHONE COMPANY, COMMNET FOUR CORNERS,
LLC, COMMNET OF FLORIDA, LLC and PRAIRIE WIRELESS, LLC**

By: _____

David J. Kaufman, Their Attorney

November 10, 2003

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